

United States Bankruptcy Court
Northern District of California

In re **Michael Howard Lilligh**
Stephanie Judith Lilligh

Debtor(s)

Case No. **12-48816**
Chapter **13**

STATEMENT PURSUANT TO RULE 2016(B)

The undersigned, pursuant to Rule 2016(b), Bankruptcy Rules, states that:

1. The undersigned has filed an entry of appearance as the attorney for the debtor(s) in this case.
2. The compensation paid or agreed to be paid by the debtor(s), to the undersigned is:
 - a) For the post-confirmation legal services rendered or to be rendered in contemplation of and in connection with this case \$ **5,000.00**
 - b) Prior to the filing of this statement, debtor(s) have paid \$ **5,000.00**
 - c) The unpaid balance due and payable is \$ **0.00**
3. The filing fee in this case appears to have been previously paid.
4. The Services rendered or to be rendered include the following:
 - a. Review and analyze current chapter 13 plan feasibility issues, Prepare and file an entry of appearance entering as the attorney for the Debtors in their Chapter 13 case.
 - b. Attempt to resolve the feasibility issues with the Debtors' current Chapter 13 plan as well as issues with pre-petition IRS and FTB tax liens including where needed or possible:
 - 1) Filing and pursuing separate motions to value the tax liens of the IRS and the FTB as to the Debtors' real estate, and personal property which was part of the bankruptcy estate,
 - 2) Filing and pursuing objections to the filed secured claims of the IRS and FTB to the extent that they are based on estate property values in excess of the fair market value at the time the case was filed and/or the Debtors' 401k plan which was never property of the estate, and,
 - 3) If needed and/or possible, filing and pursuing a motion to modify the Debtors' current Chapter 13 plan.
 - c. If/where needed, prepare, file and serve necessary amended statements and schedules, in accordance with information provided by the Debtors.
 - d. If/when needed, assist Debtors fill out Chapter 13 "closing documents" and file with Court.
5. The source of payments made by the debtor(s) to the undersigned is believed to have been from earnings, wages and compensation for services performed, and, N/A.
6. The source of payments to be made by the debtor(s) to the undersigned for the unpaid balance remaining, if any, will be from earnings, wages and compensation for services performed, and N/A.
7. The undersigned has received no transfer, assignment or pledge of property from debtor(s) except the following for the value stated: **N/A**.
8. The undersigned has not shared or agreed to share with any other entity, other than with members of undersigned's law firm, any compensation paid or to be paid except as follows: N/A.

STATEMENT PURSUANT TO RULE 2016(B)
(Continuation Sheet)

Dated: **August 29, 2017**

Respectfully submitted,

/s/ Eric M. Nixdorf

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